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November 25, 2022

VIA ECF

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Centre Street
New York, NY 10007

MEMO ENDORSED

Re: Yang v. RXHome NYC LLC, 1:22-cv-7816 (KPF)

Dear Judge Failla:

We represent Plaintiff Stephen Yang (“Plaintiff”) in the above-captioned case and write pursuant to Your Honor’s Individual Practices to respectfully request a 45-day extension of time for Plaintiff to file his application for default judgment.

- (1) the current deadline to file the default judgment application is December 2, 2022 [Dkt. No. 13]. The proposed new deadline is January 16, 2023.
- (2) Plaintiff has not made any previous requests for an extension of time.
- (3) No previous requests have been granted or denied.
- (4) Plaintiff seeks the extension to conduct further due diligence in an attempt to contact defendant or its counsel, and seeks 45 days (rather than 30 days) as a result of the holidays.
- (5) Because Defendant is in default; it neither opposes nor consents to the requested relief; however, Defendant is not prejudiced by the grant of this request.

Respectfully Submitted,

s/jameshfreeman/
James H. Freeman

Counsel for Plaintiff

Application GRANTED.

The Clerk of Court is directed to terminate the pending motion at docket entry 14.

Dated: November 28, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE